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15 **UNITED STATES DISTRICT COURT**
16 **DISTRICT OF NEVADA**

17 ADDISON HEMPEL, CASSIDY
17 HEMPEL, CHRISTINE HEMPEL, HUGH
18 HEMPEL, and SOLUTION
18 THERAPEUTICS,
19

20 Plaintiffs,

21 v.

22 CYDAN DEVELOPMENT, INC.,
22 CYDAN II, INC., VTESSE, INC.,
23 SUCAMPO PHARMACEUTICALS,
23 INC., and DOES I-X and ROE
24 CORPORATIONS I-V, inclusive,

25 Defendants.

Case No. 3:18-cv-00008-MMD-VPC

JOINT STATUS REPORT

1 Plaintiffs Addison Hempel, Cassidy Hempel, Christine Hempel, Hugh Hempel, and
 2 Solution Therapeutics (“Plaintiffs”) and Defendants Cydan Development, Inc., Cydan II, Inc.,
 3 Vtesse, Inc., and Sucampo Pharmaceuticals, Inc. (“Defendants”) submit this Joint Status Report,
 4 as directed by the Court during the April 16, 2018 Case Management Conference. ECF No. 27.
 5 Specifically, the Court directed counsel “to meet and confer regarding an amended discovery plan
 6 and scheduling order, a protocol for electronically stored information, and any protective orders
 7 that may be necessary in this case. Counsel shall then file a status report concerning these items
 8 by no later than Friday, May 18, 2018.” *Id.*

9 The parties met and conferred as directed on May 16, 2018.

10 Regarding the discovery plan and scheduling order, the parties have agreed to amend the
 11 deadlines as follows:

	<u>Old Deadline:</u>	<u>New Deadline:</u>
Discovery cut-off:	September 15, 2018	November 16, 2018
Amended pleadings/added parties:	June 17, 2018	August 17, 2018
Disclosure of initial expert witnesses:	July 17, 2018	September 17, 2018
Disclosure of rebuttal expert witnesses:	August 17, 2018	October 17, 2018
Dispositive motions:	October 15, 2018	December 14, 2018
Joint pretrial order:	November 14, 2018	January 18, 2019

20 The parties propose these deadlines because they anticipate that discovery in this case will
 21 involve numerous non-parties and a large amount of electronically stored information.

22 Regarding a protocol for electronically stored information and protective orders, the parties
 23 are negotiating these issues and request an additional thirty days to resolve them. The parties
 24 propose to submit a status report on or before June 15, 2018.

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 26 DATED: May 18, 2018

/s/ E. Leif Reid
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